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February 24, 2012

Office of Enforcement & Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington DC 20460

RE: Annual Report of Hazardous Waste Exports for Calendar Year 2011

Structural Metals, Inc. herewith reports its activities relating to the export from the United States of hazardous wastes. The information provided is required pursuant to and fulfills the obligations of 40 CFR §262.56.

U. S. EPA I.D. TXD008119414
 Structural Metals, Inc.,
 P. O. Box 911 (78156-0911)
 Steel Mill Drive
 Seguin, Texas 78155

2. Report for calendar year: 2011

3. Consignee(s):

Zinc Nacional, S. A. Serafin Peña 938 Sur Monterrey, N.L., Mexico 64000

4. Consignee:

Zinc Nacional, S.A.

EPA Description:

Emission Control Dust/Sludge from the Primary Production of

Steel in Electric Furnaces

EPA Waste Number:

K061

DOT Hazard Class:

Class 9

Transporters:

Union Pacific Railroad (EPA ID# NED001792910)

Total Amount:

28,940,200 pounds

Total Shipments:

149

5i. Description of efforts undertaken to reduce volume and toxicity:

Structural Metals, Inc. (SMI) exports this material to Zinc Nacional for the sole purpose of reclamation of the zinc metals contained therein. Its contracts with Zinc Nacional require a minimum of 20% zinc, approximately the same concentration of zinc in virgin ore. Zinc Nacional recovers the metal for use in pigments, medicines, and other commercial and

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industrial uses. The residues from the processing are non-hazardous. Therefore, after reclamation by Zinc Nacional, the hazardous waste volume is reduced to zero and the toxicity of all solid waste by-products is zero.

SMI has continued its waste minimization program to reduce the rate of K061 generation.

5ii. Description of changes in volume and toxicity achieved compared to previous years.

There have been no significant changes in the volume or toxicity of the material.

## 6. Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Philip W. Seidenberger

Director of Mills Operations, Central Region, CMC Americas Division

Date

This report was prepared by my hand. Please address any inquiries regarding this submittal to my attention.

Sincerely,

STRUCTURAL METALS, INC.

Randall Walker

Environmental Manager

P.O. Box 911 Seguin, TX 78156-0911

## CERTIFIED MAIL







## **EPA Mail**

## **Federal Activities**

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